## Case 1:18-cv-08858-AJN Document 11 Filed 01/11/19 Page 1 of 1

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January 11, 2019

## **Via Electronic Filing**

The Honorable Judge Alison J. Nathan U.S. District Court Southern District of New York 500 Pearl St New York, NY 10007

Re: Basurto et al v. Eda Food Inc. et al - Request for Extension

Case No.: 1:18-cv-08858-AJN

Dear Honorable Judge Nathan:

This law firm is in the process of being engaged by Defendants Eda Food Inc., Karena Foods Inc. and Gary Tulsiani (collectively, the "Defendants") in the above-referenced action.

Pursuant to Your Honor's Individual Motion Practices, this letter respectfully serves as a request to extend Defendants' time to reply or otherwise respond to Plaintiff's complaint through and including February 11, 2019. This request is made on consent of Plaintiffs' counsel.

This letter also respectfully serves as a request to adjourn the initial pretrial conference currently scheduled for February 1, 2019 at 3:30 p.m. to Friday, March 8, 2019, Friday, March 15, 2019, or Friday, March 22, 2019.

The reason for the request is that this law firm will require additional time to finalize the engagement in light of the fact that Defendants' principle will be traveling out of the country for the next few weeks.

This request is also made on consent of Plaintiffs' counsel.

The requested extension would not affect any other scheduled dates.

Accordingly, Defendants request an extension of time to reply or otherwise respond to Plaintiffs' complaint through and including February 11, 2019, and an adjournment of the initial pretrial conference currently scheduled for February 1, 2019 at 3:30 p.m. to Friday, March 8, 2019, Friday, March 15, 2019, or Friday, March 22, 2019.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein Joshua Levin-Epstein 1 Penn Plaza, Suite 2527 New York, New York 10119 Tel.: (212) 792-0046

Tel.: (212) 792-0046 Attorneys for Defendants

Cc: Plaintiffs' counsel (via ECF)